

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

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**AMENDED CEASE AND DESIST ORDER NO. R4-2015-0122-A01
(FILE NO. 61-108)**

**REQUIRING LOS ANGELES COUNTY FIRE DEPARTMENT AND
LOS ANGELES COUNTY INTERNAL SERVICES DEPARTMENT
TO UNDERTAKE ACTIONS
TOWARD COMPLIANCE WITH WASTE DISCHARGE REQUIREMENTS CONTAINED IN
THE WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES FROM
FORESTER AND FIRE WARDEN CAMP 13 WASTEWATER TREATMENT PLANT**

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) finds:

BACKGROUND

1. Los Angeles County Fire Department (LACoFD) owns and maintains Forester and Fire Warden Camp 13 (Camp 13) located at 1250 South Encinal Canyon Road, Malibu, California. Camp 13 is a low security female juvenile detention camp with kitchen, restroom, shower, and laundry facilities and overnight accommodations. It can house up to a population of 120 persons including 110 inmates and 10 staff.
2. Los Angeles County Internal Services Department (ISD) operates Camp 13 wastewater treatment plant (Camp 13 WWTP). The Camp 13 WWTP treats domestic wastewater generated at Camp 13 and the treated effluent is disposed through seven evaporation/percolation ponds to groundwater.
3. The Camp 13 WWTP has a design capacity for an average flow of 12,000 gallons per day (gpd) and a peak flow of 24,000 gpd. The Camp 13 WWTP consists of headworks, a flow equalization tank, a dual-train package plant with secondary clarifiers, tertiary filter chambers, a chlorine contact tank, and an effluent holding tank. The processes include biological treatment followed by filtration and disinfection. The treated and disinfected wastewater is discharged to seven evaporation/percolation ponds located approximately 500 to 1,000 feet east and uphill of the Camp 13 WWTP.
4. On June 10, 2015, the Regional Board adopted Waste Discharge Requirements (WDR) Order No. R4-2015-0121, specifying requirements for the Camp 13 WWTP. Both LACoFD and ISD are jointly referred to as Dischargers.
5. ISD cannot achieve immediate compliance with the requirements listed in the WDR Order No. R4-2015-0121. Therefore, a Cease and Desist Order (CDO) No. R4-2015-0122 adopted on June 10, 2015, sets forth a time schedule for ISD to complete corrective and preventative actions to achieve full compliance with the WDR Order.

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6. CDO No. R4-2015-0122 includes, but is not limited to, the following requirements:
- Achieve compliance with all the effluent limits contained in WDR Order No. R4-2015-0121 by December 31, 2015,
 - Submit a groundwater investigation work plan to assess the causes of groundwater impacts from total coliform, fecal coliform, and nitrate-nitrogen by December 31, 2015,
 - Submit a groundwater investigation report outlining the extent of any groundwater pollution or contamination caused by previous effluent discharge from the Camp 13 WWTP and a mitigation plan (with schedules and milestones) to achieve compliance with all the groundwater limits contained in WDR Order No. R4-2015-0121 by August 31, 2016, and
 - Submit a technical report to demonstrate that the effluent from the Camp 13 WWTP is meeting both total coliform and fecal coliform effluent limitations of 2.2 most probable number per 100 milliliters (MPN/100mL) respectively and does not contribute to groundwater degradation above the groundwater quality objective by August 31, 2018.

COMPLIANCE HISTORY

- In June 2015, ISD completed additional upgrades to the Camp 13 WWTP. The additional upgrades included activating the anoxic tank for denitrification purpose, replacing the disinfection mechanism using liquid chlorination, and installing new tertiary filter media.
- Based on effluent monitoring data, the effluent water quality has met effluent limitations for total coliform of 2.2 MPN/100mL, fecal coliform of 2.2 MPN/100mL, and nitrate-nitrogen for 10 milligrams per liter (mg/L), respectively since January 2016 to present.
- Based on groundwater monitoring data from 2011 to present, groundwater was impacted with total coliform up to 140 MPN/100mL, 1,600 MPN/100mL, and 1,600 MPN/100mL at monitoring wells MW-1, MW-2, and MW-3, respectively. Fecal coliform was detected up to 23 MPN/100mL, 1,600 MPN/100mL, and 1,600 MPN/100mL at monitoring wells MW-1, MW-2, and MW-3, respectively.
- Groundwater samples collected at monitoring well MW-3 adjacent to Percolation Pond 2 indicated that nitrate-nitrogen was detected at 29 mg/L, 24 mg/L, and 10 mg/L during December 2014, March 2015, and March 2016, respectively.
- The groundwater monitoring data indicated groundwater containing total coliform, fecal coliform, and nitrate-nitrogen had exceeded groundwater quality objectives for total coliform of 1.1 MPN/100mL, fecal coliform of 1.1 MPN/100mL, and nitrate-nitrogen of 10 mg/L as specified in the Basin Plan.
- On December 22, 2015, ISD submitted the *Groundwater Investigation Workplan*

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(Workplan) to evaluate the causes of groundwater impact by total coliform, fecal coliform, and nitrate-nitrogen. The Workplan proposed to install one shallow and two deep groundwater monitoring wells, together with the potential use of an inactive production well as a third deep monitoring well to determine site-specific groundwater flow direction and gradient for the purposes of adequately assessing any impacts to the quality of the receiving groundwater around the evaporation/percolation ponds.

13. Subsequently, ISD determined the inactive production well was not feasible for monitoring purposes and submitted the *Revised Groundwater Investigation Workplan* (Revised Workplan) dated March 11, 2016 to propose installation of one shallow and three deep groundwater monitoring wells. The Revised Workplan also incorporated Regional Board comment to relocate the proposed deep monitoring well MW-5 near Percolation Ponds 6 and 7, which have been used for discharging treated effluent from the Camp 13 WWTP since March 2015. Regional Board approved the Revised Workplan on March 25, 2016.
14. On March 31, 2016, ISD requested a time extension to submit a groundwater investigation report from August 31, 2016 to March 31, 2017.
15. Based on the scope of work proposed in the Revised Workplan, ISD now estimates that the total project cost will increase from approximately \$100,000 to \$650,000 for the following reasons:
 - a. The existing inactive production well cannot serve as a monitoring well. Therefore, an additional deep groundwater monitoring well shall be installed.
 - b. Based on the topography where the two deep monitoring wells are to be installed in the vicinity of seven evaporation/percolation ponds, the track-mounted drill rig and the development rig need to be towed up the steep access road.
 - c. The steep and rough access road needs to be leveled and packed to allow mobilization of the heavy drilling equipment required for the groundwater monitoring well installation.
 - d. It requires more caution to drill monitoring wells at locations where complex lithology with bedrock structure is anticipated.
16. According to the information provided by ISD, the project will be classified as a Capital Project due to the increased costs. Therefore, ISD needs additional time to engage in a separate administrative process to obtain Los Angeles County Board of Supervisors (BOS) approval for funding to implement the project. In addition, the project with the currently estimated cost has to be managed through an extensive bidding process.
17. ISD estimates that it takes six weeks to obtain BOS approval for funding. The time needed involves:
 - preparation of a BOS Letter as the item on the BOS agenda
 - noticing of the agenda

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- culmination of the actual BOS meeting and approval of funding
18. ISD also estimates four months to complete the extensive bid process which includes:
- preparation of the Request for Proposal (RFP) package containing the technical specifications, design, and contracting details for advertisement
 - submittal of the RFP for bidding
 - selection of RFP for an award to the contractor
19. In addition, ISD proposes the following timeline for specific milestones:
- a. Complete the bid process by August 22, 2016
 - b. Install all monitoring well by January 20, 2017
 - c. Submit groundwater investigation report by March 31, 2017
20. CDO No. R4-2015-0122 requires ISD to submit a groundwater investigation report outlining the extent of any groundwater pollution caused by previous discharge from the Camp 13 WWTP and a mitigation plan by August 31, 2016. However, ISD will not be able to meet the deadline due to additional time needed for obtaining funding and implementing the project.
21. TO date, ISD has demonstrated good faith efforts to comply with the requirements prescribed in CDO No. R4-2015-0122 by meeting each deadline since June 2015. In addition, ISD has prepared the BOS Letter requesting funding for groundwater monitoring well installation, which was subsequently approved by Los Angeles County Board of Supervisors on June 8, 2016 Board Meeting.

IT IS HEREBY ORDERED that, pursuant to California Water Code (CWC) sections 13301 and 13267, the Dischargers, Los Angeles County Fire Department and Los Angeles County Internal Services Department, as the owner and operator of the Camp13 WWTP that discharges effluent to evaporation/percolation ponds shall cease and desist discharging waste in violation of CDO No. R4-2015-0122-A01, by complying with the following:

1. By **March 31, 2017**, the Dischargers shall submit a groundwater investigation report outlining the extent of any groundwater pollution or contamination caused by previous effluent discharge from the Camp 13 WWTP and a mitigation plan (with schedules and milestones) to achieve compliance with all the groundwater limits contained in WDR Order No. R4-2015-0121.
2. If, in the opinion of the Regional Board or its delegate, the Dischargers fail to comply with the provisions of this Order, the Regional Board may pursue further enforcement action, including, but not limited to, the issuance of a complaint for administrative civil liability. Failure to comply with this Order may result in the assessment of an administrative civil liability up to \$1,000 per violation per day, pursuant to CWC section 13268 and/or \$5,000 per violation per day, pursuant to CWC section 13350. Any discharge of a pollutant to waters of the United States may also result in an administrative civil liability up to \$10,000 per discharge violation per day pursuant to

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CWC section 13385. In addition, the Regional Board may refer this matter to the Attorney General for judicial enforcement for the failure to comply with this Order. The Regional Board reserves its right to take any enforcement actions authorized by law.

ELECTRONIC SUBMITTAL OF INFORMATION

Dischargers are directed to submit all reports required under this CDO adopted by the Regional Board, including groundwater monitoring data in Electronic Data Format, discharge location data, and searchable Portable Document Format of reports and correspondence, to the State Water Resources Control Board GeoTracker database under Global ID WDR100001050.

I, Samuel Unger, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on July 14, 2016.

Samuel Unger, P.E.
Executive Officer

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